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James J. Keller*
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+ Admitted to Maryland only

*Communications engineer
(Non lawyer)

June 3, 1998

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RECEIVED

JUN 3 - 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

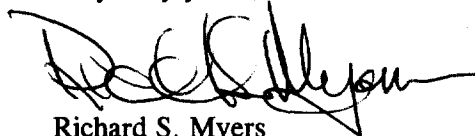
Re: Notice of Oral Ex Parte Presentation
Cellular Service in the Gulf of Mexico
WT Docket No. 97-112 / CC Docket No. 90-6

Dear Ms. Salas:

On Wednesday, June 3, 1998, Myers Keller Communications Law Group and Fleischman and Walsh, L.L.P., on behalf of Petroleum Communications, Inc. ("PetroCom") and Bachow/Coastel, L.L.C. ("Coastel"), respectively, made an ex parte presentation concerning the referenced proceeding at a meeting with the following members of the Wireless Telecommunications Bureau: Mr. Stephen Markendorff, Mr. Michael Ferrante, Ms. Ramona Mellson, Mr. Wilbert E. Nixon, Jr., and Ms. Linda Chang.

At the meeting, PetroCom and Coastel (collectively, the "Gulf carriers") responded to oral ex parte presentations made by GTE Service Corporation ("GTE") on March 5, 18 and 20, 1998, as well as to the written presentation made by a "coalition" of land-based carriers on March 18 (to which the Gulf carriers submitted a written response on May 29). The Gulf carriers demonstrated that their proposals (submitted on March 2) served the Commission's goals in the referenced proceeding while GTE's proposals do not serve those goals. The enclosed material (along with copies of the March 2 and May 29 submissions) was used during the discussion. The staff suggested that the Gulf and land carriers work together to resolve their conflicting positions in the proceeding. The Gulf carriers stated they would attempt to do so.

Very truly yours,


Richard S. Myers

Enclosures

cc: Stephen Markendorff
Michael Ferrante
Ramona Mellson
Wilbert E. Nixon, Jr.
Linda Chang

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**Presentation by Petroleum Communications, Inc. ("PetroCom") and
Bachow/Coastel, LLC ("Coastel") to Wireless Telecommunications Bureau**

**Cellular Service In The Gulf Of Mexico
WT Docket No. 97-112; CC Docket No. 90-6**

Wednesday, June 3, 1998

Principal Goals of Gulf Rulemaking Proceeding

- 1) Establish a comprehensive regulatory scheme that will reduce conflict between water-based and land-based carriers
- 2) Provide regulatory flexibility to Gulf carriers because of the transitory nature of water-based sites
- 3) Award licenses to serve well-traveled coastel areas to those carriers that value the spectrum most highly and will maximize its use to provide the best quality of service to the public
- 4) Ensure wide-spread, seamless and reliable coverage along the shoreline

The Gulf Carriers' Proposal (submitted on March 2, 1998)

The Gulf carriers have proposed that the Commission:

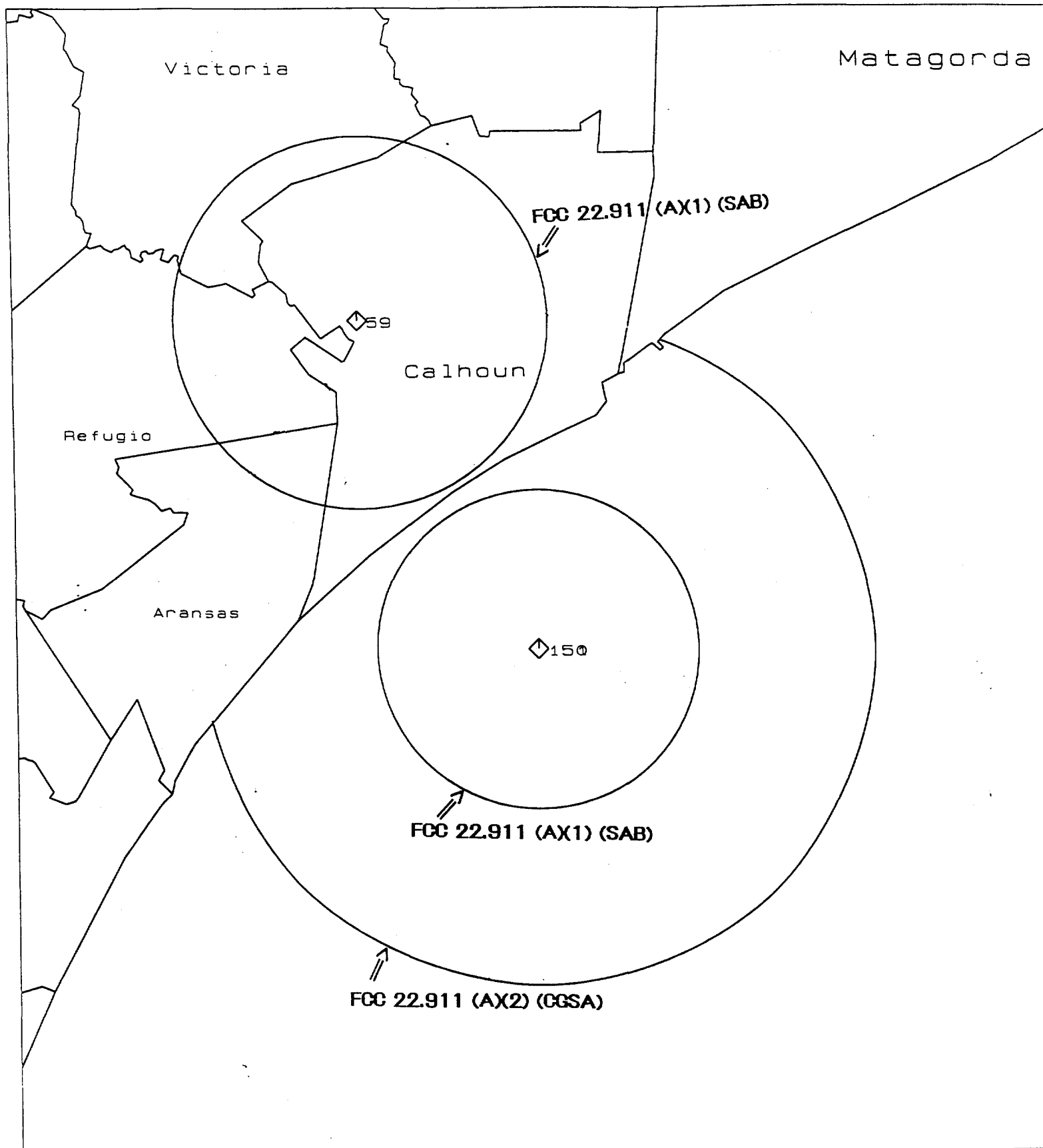
- a) define and graphically depict the market boundary on a 1:24,000 scale USGS scale maps that contain a latitude/longitude grid;
- b) maintain CGSA definitions per §§22.911(a)(1) and (2), but permit equal field strengths at the boundary calculated by §22.911(a)(1);
- c) grant equal and reciprocal collocation rights for land-based transmitters;
and
- d) modify fill-in periods to allow effective implementation of collocation rules.

The Gulf Carriers' Proposal Fulfill the Goals of the Rulemaking

- 1) Clear depiction of market boundaries and equal field strength at those boundaries, coupled with equal and reciprocal collocation rules eliminates confusion and uncertainty, thereby reducing conflict between carriers.
- 2) Providing flexibility for Gulf carriers to locate transmitters on land -- while affording land carriers equal and reciprocal collocation rights -- accommodates transitory nature of water-based sites.
- 3) Modifying fill-in periods to permit implementation of collocation rules expedites and maximizes service to the public along coastal areas in the near term.
- 4) Clear market boundaries, equal field strengths at those boundaries, and equal and reciprocal collocation rights will ensure wide-spread, seamless and reliable coverage along the shoreline.

The Land Carriers' Proposal Does Not Meet those Goals

- 1) Taking away a portion of the Gulf carrier's service area (i.e., the Coastal Zone) and giving it to land based carriers is without legal justification and does nothing to reduce conflict between the Gulf and land carriers. Nor would GTE's "compromise" position reduce conflict -- it would increase conflict as Gulf carriers challenge land carriers' justifications for extensions in the Gulf waters and parties "petition" the FCC seeking approval for extensions.
- 2) The land carriers' proposal provides no regulatory flexibility that accommodates the transitory nature of water-based sites. In fact, the land carriers see this problem as an opportunity to persuade the FCC to take away Gulf carriers' service territory and simply give it to the land carriers.
- 3) Simply giving the Coastal Zone to the land carriers -- or permitting them to unilaterally extend service contours into the Gulf (with no reciprocal right afforded to the Gulf carriers to extend onto land) -- insulates the land carriers from competition and will not result in the best quality of service to the public.
- 4) Subjecting requests by the land carriers to extend service into the Gulf in case-by-case review proceedings will create a flood of litigation and does not ensure wide-spread, seamless and reliable coverage along the shoreline; rather, it creates more uncertainty.



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January 19, 1998

Jerry Rosenbaum
Petroleum Communications
5901 Earhart Expressway
Harahan, LA 70123

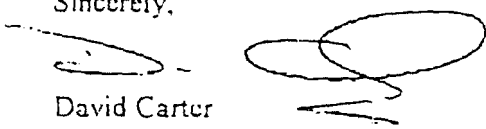
Dear Jerry,

Per our phone conversation last week concerning the operation of back-to-back cell sites by our companies, this letter memorializes Centennial's opinion of our experience.

In the summer of 1997, following the completion of an overlap agreement between our two companies, we established back-to-back cell sites at three locations as close as possible to the shoreline in our Beaumont-Port Arthur MSA and our Louisiana 5 RSA. During the negotiation of that overlap agreement, careful attention was paid to antenna design with the objective of ensuring that call initiation by mobiles on either side of the shoreline would occur such that revenue accrued to the licensee of the market in which the mobile was located at the time of initiation. In order to maximize the combined coverage of both of our systems, wide beam antennas were used with moderate front to back ratios. The ensuing performance since system commissioning has been in line with anticipated performance. Both of us have achieved the coverage required with a strict and acceptable demarcation line governing call initiation. We see this as a clear demonstration that the coast line boundary, which, under current FCC rules, is coincident with market boundaries between land-based, and gulf-based carriers can be treated in an identical fashion to a similar market boundary between two land-based markets. In each case, if sufficient signal is to exist at the boundary which can provide high quality service to subscribers, operators must cooperate in allowing reasonable contour overlaps and the ultimate cooperation involving the establishment of back-to-back cell sites at the boundary has been shown to be a viable and attractive method of introducing seamless coverage at market boundaries while ensuring that revenue accrues to the proper licensee.

Centennial anticipates future similar cooperative ventures with Petrocom and sees their success as a complete repudiation of any argument which advocates a change in market boundaries in order to ensure the provision of satisfactory service to subscribers along the shoreline. In cases where back-to-back cell sites are not mutually attractive, we also anticipate that either party should be prepared to accept reasonable contour overlaps which, wherever possible, will be engineered to ensure a balance of signals at the boundary with adequate signal to provide quality service to each party's subscribers. Given such a degree of cooperation by both involved parties, we see no reason for a change in the current boundaries between our markets at the present time.

Sincerely,



David Carter
Director of RF Engineering

Dsp/DC